Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Framework for Next Generation 911 Deployment) PS Docket No. 10-255

REPLY COMMENTS BY
THE N11/8XX ESSENTIAL SERVICES INTEROPERABILITY COUNCIL

The N11/8XX Essential Services Interoperability Council ("NESIC")[1] hereby submits reply comments to the Commission regarding the above-captioned proceeding for Framework for Next Generation 911 Deployment, PS Docket No. 10-255, Notice of Inquiry ("*NOI*").

COMMENTS

NESIC stated in its original filing that we were very concerned that some do not have access to all the N11/8XX essential services dependent on the communications technology they use. This includes many VoIP customers/users plus those who are deaf, hard-of-hearing, speech-impaired or deaf-blind and using IP Relay/Video Relay services as their main access to hearing community, businesses, and government and others.

It was gratifying to read IETF ECRIT/GEOPRIV chairs' comments stating "There is no technical difference between IP calling to 9-1-1 and other N11 numbers. At a technological level, all of these numbers can take advantage of the same geolocation and call routing resources as NG911. The ECRIT architecture anticipates this multiple use by creating an extensible system of identifiers for services, the so-called \service URNs" The only difference between a 911 call and a call to an N11 number is which service URN is used, an emergency URN from the \urn:service:sos" class, or a non-emergency URN such as those in the "urn:service:counseling" class."(page 16)

[1] The N11/8XX Essential Services Interoperability Council (NESIC) is a federation of organizations created to facilitate interoperability among N-1-1 and 8XX essential services, collaborate on policy issues, develop technical standards and operating procedures and serve as one voice for all N-1-1 and 8XX services to the government, the public and private industry. Members include representatives for 2-1-1, 3-1-1, 5-1-1, 7-1-1, 8-1-1, 9-1-1 and national 8XX numbers for poison control centers and suicide hotlines

IEEE 802.18 comments stated that cost savings are possible if we share NG9-1-1 components, adding, " We expect to share most of the infrastructure with only minimal distinction for ES calls. We expect only to have a differentiation between emergency and non-emergency calls. This distinction will not be based on the numeric structure of the N11 PSTN dial string. We expect there to be sufficient address space in the SIP header to address multiple emergency services or sub-types thereof. " (page 5)

We appreciate the support of APCO, "Integration of N11 services in NG911 systems merits consideration, provided that interconnection of those N11 services does not negatively impact the receipt or transmission of emergency calls," (page 7) and NENA, ".While NG9-1-1 ESInets will be designed to support emergency services, it is possible and appropriate that N-1-1 and 9-1-1 services could share NG9-1-1 components…" (page 24).

CONCLUSION

We remain very concerned that some do not have access to all the N11/8XX essential services dependent on the communications technology they use and as advancements in communications services continue, that number climbs.

NESIC believes that it is important for the FCC to help lead the needed federal effort for determining best approaches for N11/8XX essential services integrating into NG9-1-1 going forward. This may be best started by the FCC having an NG N11 Notice of Inquiry or other similar leadership action. Thank you.

Respectfully submitted,

N11/8XX ESSENTIAL SERVICES INTEROPERABILITY COUNCIL	
/s/ Richard L Jones Richard L Jones Chair NESIC 953 N Church St Rockford, IL 61103 815-519-7841	

MARCH 14, 2011